



4242 MERRICK ROAD, MASSAPEQUA, NEW YORK 11758

ATTORNEYS

JUSTIN M. REILLY, ESQ.
KEITH E. WILLIAMS, ESQ.

PARALEGALS

ROSA COSCIA
CATALINA ROMAN

Via: ECF

May 15, 2025

Hon. Judge Nusrat J. Choudhury
United States District Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: *Contreras v. Polar Property Services, Inc., et al.*; 2:25-cv-00418-NJC-AYS

Dear Hon. Judge Choudhury:

I represent Defendants in this Fair Labor Standards Act case. Pursuant to Your Honor's April 1, 2025 Electronic Order, in which the Court set a briefing schedule for Defendants' Motion to Dismiss Plaintiff's Complaint, and Your Honor's Individual Rules, Defendants have submitted their unopposed Motion to Dismiss at ECF D.E. 14. Defendants complied with Your Honor's Scheduling Order and Bundling Rule, [Rule 5.2.6], by sending their motion papers to Plaintiff's Counsel on April 21, 2025 and filing the cover letter with the Court at ECF D.E. 13 [*see* Rule 5.2.7]. Plaintiff did not oppose the motion or file an Amended Complaint within the time set by Your Honor, nor did Plaintiff timely request an extension from the Court. Accordingly, Defendants submit that their Motion to Dismiss is unopposed and should be granted in its entirety. Pursuant to Rule 5.2.7, Defendants' unopposed motion papers include the following:

1. Defendants' Notice of Motion to Dismiss Plaintiff's Complaint;
2. Defendants' Memorandum of Law in Support of Defendants' Motion to Dismiss;
3. The Declaration of Keith E. Williams, Esq. in Support of Defendants' Motion to Dismiss;
4. Exhibit A, Complaint.

We thank the Court for its time and attention to this matter.

Respectfully submitted,



Keith E. Williams, Esq.

cc: all counsel of record, via ECF.